

# **Exhibit KK**

JENNER & BLOCK LLP  
Reid J. Schar (*pro hac vice*)  
RSchar@jenner.com  
353 N. Clark Street  
Chicago, IL 60654-3456  
Telephone: (312) 222-9350  
Facsimile: (312) 527-0484

CLARENCE DYER & COHEN LLP  
Kate Dyer (Bar No. 171891)  
kdyer@clarencedyer.com  
899 Ellis Street  
San Francisco, CA 94109-7807  
Telephone: (415) 749-1800  
Facsimile: (415) 749-1694

CRAVATH, SWAINE & MOORE LLP  
Kevin J. Orsini (*pro hac vice*)  
korsini@cravath.com  
825 Eighth Avenue  
New York, NY 10019  
Telephone: (212) 474-1000  
Facsimile: (212) 474-3700

Attorneys for Defendant PACIFIC GAS AND  
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC  
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**SUPPLEMENTAL DECLARATION OF  
[REDACTED] IN SUPPORT OF  
RESPONSE TO FOLLOW-UP  
QUESTIONS RE DIXIE AND FLY FIRES**

Judge: Hon. William Alsup

1 I, [REDACTED], hereby declare under penalty of perjury as follows:

2 1. I make this declaration based upon personal knowledge and if called as a witness I  
3 could and would testify competently to the matters set forth herein.

4 2. On August 16, 2021, Pacific Gas and Electric ("PG&E") submitted a filing to the  
5 Court stating that, under PG&E's 2021 Equipment Risk Model, the section of the Bucks Creek  
6 distribution line in which a tree fell on the line "was ranked 11 out of 3,635 circuit sections."

7 3. On August 17, 2021, the Court issued an order asking PG&E about the #11  
8 ranking. Specifically, the Court ordered PG&E to respond to the following question:

9 Question 5: The circuit was ranked 11 out of 3,635 circuits with respect to  
10 Equipment Risk. Please state each reason the circuit received such an  
11 elevated risk ranking.

12 4. I was asked to execute a declaration explaining this risk ranking in response to the  
13 Court's question. On August 25, I executed a responsive declaration.

14 5. In that declaration, in addition to explaining the basis for the current (2021 model)  
15 elevated risk ranking of this Bucks Creek section that was referenced in the Court's question, I  
16 was also asked to explain that "an earlier model" used in 2019 and 2020, which employed a  
17 different methodology, had produced a lower ranking. I understood this discussion of the "earlier  
18 model" was to show how the current elevated ranking—which was set forth in the earlier filing  
19 and referenced in the Court's question—had risen from the prior ranking produced by the older  
20 model. In discussing the prior risk ranking, I did not intend to mislead or confuse the Court by not  
21 repeating the operative risk ranking that was mentioned in the Court's question to which I was  
22 responding.

23 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
24 knowledge.

25 Executed this 16th day of September, 2021, in the City of SAN CLEMENTE, County of  
26 ORANGE, State of California.